

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

EDWARD RAMIREZ,

Petitioner,

v.

DAVID DIGUGLIELMO, et al.

Respondents.

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No. 2:12-cv-05803

JOINT MOTION TO TERMINATE PROCEEDINGS

Petitioner and Respondents, by and through undersigned counsel, hereby jointly move the Court to terminate and mark these proceedings closed, as the matter has been resolved. In support thereof, the parties represent as follows:

1. On September 15, 2016, this Court stayed these proceedings related to Mr. Ramirez’s petition for a writ of habeas corpus pending the resolution of Mr. Ramirez’s Post Conviction Relief Act (“PCRA”) Petition in state court dated November 30, 2015. ECF No. 66.
2. On November 2, 2023, the Honorable Scott DiClaudio entered an order granting Mr. Ramirez’s PCRA petition and vacating his conviction and sentence for second-degree murder.
3. On November 30, 2023, the Commonwealth entered a nolle prosequi regarding Mr. Ramirez’s retrial.

4. As the matter is resolved, the parties agree that this Court may terminate these proceedings and mark the case closed.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court terminate these proceedings as concluded and resolved and mark the case closed.

Respectfully submitted,

/s/ David Napiorski
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Dated: December 11, 2023